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DEC 21 1999

Mr. Paul Pardi, RCRA Group Leader
and FFCA Project Manager
Ohio Environmental Protection Agency
Division of Hazardous Waste Management
401 East 5th Street
Dayton, Ohio 45402-2911

DOE-1143-99

Mr. Michael Savage, Assistant Chief
Ohio Environmental Protection Agency
Division of Hazardous Waste Management
1800 Watermark Drive
Columbus, Ohio 43216-1049

Dear Mr. Pardi and Mr. Savage:

NOTIFICATION OF THE NEED TO AMEND THE FERNALD SITE TREATMENT PLAN

- References:
- 1) Letter, J. Reising, DOE-FEMP, to J. Saric, U.S. EPA, and T. Schneider, OEPA, "Milestone Schedule Revisions," dated March 25, 1999
 - 2) Letter, J. Reising, DOE-FEMP, to J. Saric, U.S. EPA, and T. Schneider, OEPA, "Nuclear Material Dispositioning Milestone Date," dated June 1, 1999
 - 3) Letter, J. Craig, DOE-FEMP, to P. Pardi, OEPA, and M. Savage, OEPA, "Notification of the Need to Amend the Fernald Site Treatment Plan," dated December 31, 1998

On June 30, 1999, the Fluor Daniel Fernald, Inc. (FDF) and Department of Energy (DOE) representatives conferred with Phil Harris and Paul Pardi of the Ohio Environmental Protection Agency (OEPA) to discuss mixed waste management issues at the Fernald Environmental Management Project (FEMP).

During this meeting, discussion focused on historic and current mixed waste inventory status, the relationship between the existing FEMP Site Treatment Plan (STP) and the recent efforts by DOE and FDF to replan much of the site waste management program.

Mr. Paul Pardi
Mr. Michael Savage

-2-

DEC 21 1999

As you may recall from the meeting, earlier this year FEMP realized a significant impact to the site budget and schedules due to the addition of nuclear material disposition activities to the site project baseline scope (see References 1 and 2). The addition of this work scope made it necessary to review site priorities and to reschedule work. As a result, schedules for the mixed waste treatment projects have been impacted. This is due to the addition of new waste volumes (i.e., nuclear materials declared to be waste) requiring treatment, the need for new treatment technology, and the reallocation of site resources to support nuclear material disposition activities. Site schedules for mixed waste treatment will require that some of the mixed waste inventory be stored for one year or more. DOE proposes changes to the current STP to include the changes in waste volumes, technologies, and schedules.

The proposed amendments to the STP are summarized as follows:

1. Two new projects have been added to Section 3.1, Waste Streams for Which Technology Exists: Organic Treatment Project (Subsection 3.1.8), and Inorganic Treatment Project (Subsection 3.1.9).
2. The two Preferred Options, Wastewater Treatment (Section 3.1.4) and TSCA Incinerator (Section 3.1.7), associated with the Liquid Mixed Waste Project, have been split into two phases. During Phase 1, milestones were established for treating the initial inventory of mixed waste identified in the FEMP 1995 Site Treatment Plan. Text has been added to indicate that these milestones have been completed. New milestones are proposed for Phase II of these preferred options which addresses the treatment of the FEMP current mixed waste inventory.
3. Section 3.1.6 has been revised to reflect the last date that treatment was completed under the Chemical Treatment Project. This preferred option remains active to allow for the option of treating mixed wastes on-site using a mobile vendor-supplied treatment system.
4. Section 3.3 has been revised to provide schedules for completing technology assessments for treating mixed uranium and mixed thorium wastes (Reference 3).

Additional information and justification for these amendments are provided as Enclosure 1. Enclosure 2 provides information on current and projected quantities of mixed waste assigned to each preferred option and the current quantity of mixed waste which has been in storage for greater than one year. The proposed amendments to the STP are provided as Enclosure 3.

The proposed amendments to the STP have been prepared as replacements for Pages 6 through 14 of the Plan volume of the Fernald STP. The proposed text changes are provided with redline or strikeout for easy identification.

000002

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Mr. Paul Pardi
Mr. Michael Savage

-3-

DEC 21 1999

Please contact John Sattler at (513) 648-3145 if you wish to discuss any aspects of this notification.

Sincerely,



Jack R. Craig
Project Manager

FEMP:Sattler

Enclosures

cc w/enclosures:

T. Binau, AAM/OH
S. Kaster, OH/FEMP
J. W. Reising, OH/FEMP
J. Sattler, OH/FEMP
T. Schneider, OEPA-Dayton
J. Saric, USEPA-V, SRF-5J
J. B. Bradburne, FDF/35-1
D. Cook, FDF/16-2
T. Hagen, FDF/65-2
C. Tellez, FDF/52-3
T. Walsh, FDF/65-2
AR Coordinator, FDF/6

cc w/o enclosures:

EDC, FDF/52-7

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SUMMARY AND JUSTIFICATION FOR PROPOSED AMENDMENTS TO THE FEMP'S SITE TREATMENT PLAN

The following summary provides information on the proposed amendments to the FEMP's Site Treatment Plan (STP). These amendments are required to include additional waste volumes and to address changes in treatment technologies and schedules resulting from recent efforts by the FEMP to replan the site's waste management program. Earlier this year, the FEMP realized a significant impact to the site budget and schedules due to the addition of nuclear material disposition activities to the project baseline scope. The addition of this work scope made it necessary to review site priorities and to reschedule work. As a result, schedules for mixed waste treatment projects have been impacted requiring the FEMP to propose amended schedules for treating the current inventory of mixed wastes.

The following amendments are proposed for the FEMP's STP:

1. Section 3.1, Waste Streams for Which Technology Exists, has been revised to include two new projects: Organic Treatment Project (Subsection 3.1.8) and the Inorganic Treatment Project (Subsection 3.1.9).

The Organic Treatment Project proposes the establishment of a September 30, 2001 milestone for project completion. Current plans are for off-site shipment and subsequent treatment. Thus, the project schedule will be constructed in accordance with the *"typical schedule for mixed wastes to be shipped off-site for treatment"* outlined in Table 4 of the Director's Final Findings and Orders (DF&O). Wastes treated under this project will be shipped to Materials and Energy Corporation in Oak Ridge, Tennessee for treatment under the DOE Complex-Wide Broad Spectrum contract. Currently, 237 m³ of mixed waste has been assigned to this project.

The Inorganic Treatment Project proposes the establishment of a September 30, 2002 milestone for project completion. The project will follow the *"typical schedule for mixed wastes to be shipped off-site for treatment"* described in Table 4 of the Director's Final Findings and Orders. The FEMP is currently proposing to ship these waste streams to Waste Control Specialists (WCS) located in Andrews, Texas for treatment. WCS was awarded a DOE complex-wide Broad Spectrum contract for the treatment of inorganic mixed wastes. A total volume of 39 m³ of mixed waste has been assigned to this project.

2. The two Preferred Options, Wastewater Treatment (Section 3.1.4) and TSCA Incinerator (Section 3.1.7) associated with the Liquid Mixed Waste Project have been split into two phases. During Phase I, milestones were established for treating the initial inventory of mixed waste identified in the FEMP's 1995 Site Treatment Plan. Text has been added to indicate that these milestones have been completed. Phase II addresses the treatment of the FEMP's existing inventory of liquid mixed waste.

As part of Phase II of the Waste Water Treatment Preferred Option, the FEMP is proposing new milestones of November 1, 1999 to March 1, 2000 to complete

treatment of the current inventory of 5 m³ of mixed waste waters on-site through the Advanced Waste Water Treatment System (AWWT). This time frame will allow for the completion of confirmatory sampling to verify that these wastes are acceptable for treatment through the AWWT. The AWWT utilizes precipitation/filtration to treat metal constituents while organic constituents are treated by an activated carbon adsorption unit operation as part of AWWT Phase 2. Discharges from the AWWT are regulated under the site's National Pollution Discharge Elimination System (NPDES) permit.

As part of Phase II of the TSCA Incinerator Preferred Option, the FEMP is proposing an updated milestone of September 30, 2000 for completing shipment of Batches 9, 10 and 11 (238 m³ of low-level, PCB and mixed waste) off-site to the TSCA Incinerator in Oak Ridge, Tennessee for treatment. This schedule is based on the TSCA Incinerator FY 2000 Burn Plan which allocates treatment capacity at the TSCA Incinerator for this fiscal year. The plan, as it relates to the FEMP, includes shipment of Batch 9 in October/November 1999, Batch 10 in February/March 2000 and Batch 11 in April/May 2000. Since capacity is allocated on a fiscal year basis, schedules for shipping additional batches of liquid mixed waste will be provided in the 2000 STP Annual Update to be submitted by December 31, 2000. Currently, there are 103 m³ of mixed waste assigned to this option.

3. Section 3.1.6 has been revised to reflect the last date that treatment was completed under the Chemical Treatment Project. This preferred option remains active to allow for the option of treating mixed wastes on-site using a mobile vendor-supplied treatment system. There is currently no inventory assigned to this preferred option. It is anticipated that mixed remediation waste generated from on-site CERCLA remedial actions may be treated in the future using this preferred option.
4. Section 3.3, Mixed Waste Streams Requiring Further Characterization or for which Technology Assessment Has Not Been Done, has been revised to include schedules for completing technology assessments for treating mixed uranium (Section 3.3.1) and thorium waste (Section 3.3.2).

The FEMP has identified a total quantity of approximately 69 m³ of mixed waste from the population of uranium materials that were declared waste in December 1998. Since the FEMP has not completed a full technology assessment of this material, Section 3.3.1 includes a commitment of on or before December 31, 1999 for submitting a proposed amendment to the STP specifying the associated target dates or milestones for reducing the mixed uranium waste inventory. This date coincides with issuance of the STP Annual Update. Current plans are to complete the disposition of this waste no later than December 31, 2005.

Section 3.3.2 proposes an alternate schedule to the schedules provided in the December 1998 FEMP Site Treatment Plan for the disposition of 79 m³ of thorium legacy mixed waste. Several waste streams within this population are undergoing further evaluation to determine treatment requirements or for possible recharacterization as non-hazardous waste. The FEMP is proposing to establish a milestone of January 31, 2000 for submitting a proposed amendment to the STP specifying the associated target dates or milestones for reducing this inventory. Current options for the treatment of these wastes include treatment at an off-site

2698

facility or stabilization on-site as part of the Silo 3 Project. This project is part of the site CERCLA remediation and involves the stabilization of approximately 3,890 m³ of metal oxides stored in Silo 3.

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ENCLOSURE 2

TABLE 1: CURRENT AND PROJECTED FIVE-YEAR QUANTITIES OF MIXED WASTE ASSIGNED TO EACH PREFERRED OPTION

PREFERRED OPTION	QUANTITY IN INVENTORY ASSIGNED TO PREFERRED OPTION (M ³) ^a	PROJECTED 5-YEAR QUANTITY TO BE ASSIGNED TO EACH PREFERRED OPTION (M ³)
Wastewater Treatment	5	0
Ohio Mobile Chemical Treatment System	0	0
TSCA Incinerator	103	623
Organic Treatment Project	237	255
Inorganic Treatment Project	39	1697
Thorium Legacy Mixed Waste	79	0
Uranium Waste Disposition (UWD) Materials	69	0

^a Based on quantities of mixed waste in inventory on 9/30/99.

TABLE 2: STATUS OF MIXED WASTE CURRENTLY IN STORAGE FOR EACH PREFERRED OPTION

PREFERRED OPTION	QUANTITY IN STORAGE FOR ≥ 1 YEAR (M ³) ^a	QUANTITY IN STORAGE FOR < 1 YEAR (M ³) ^a
Wastewater Treatment	4.8	0.2
Ohio Mobile Chemical Treatment System	0	0
TSCA Incinerator	96	7
Organic Treatment Project	225	12
Inorganic Treatment Project	29	10
Thorium Legacy Mixed Waste	79	0
UWD Materials	0	69

^aBased on quantities of mixed waste in inventory on 9/30/99.

**3.1.4 Waste Streams for which Technology Exists - Preferred Option:
Wastewater Treatment, Phase I**

Project Name: Liquid Mixed Waste Project

The FEMP mixed waste streams for which the Preferred Option is identified as Wastewater Treatment are located in Table 4 of the Background Volume. Treatment of these waste streams will occur on-site in an existing facility. This project is part of the Liquid Mixed Waste Project. Liquids are will be bulked, tested and a determination will be made whether they are acceptable for the FEMP Wastewater Treatment System. Detailed information on this treatment is located in Section 3.1.4 of the Background Volume.

The Liquid Mixed Waste Project is designed to address treatment and disposal of all liquid mixed waste currently in storage through the WWTS or the TSCA Incinerator Preferred Options.

MIXED WASTE STREAMS FOR WHICH TECHNOLOGY EXISTS

Project Start Date: October 31, 1994 (COMPLETED)

Schedule for submitting all applicable permit applications:

Not applicable. This project ~~will be~~ ~~was~~ initiated as part of CERCLA Removal Action #9 (RA #9). RA #9 ~~will be~~ ~~was~~ modified to clarify the scope of work and ~~will be~~ ~~is~~ consistent with the FEMP's Investigation Derived Waste (IDW) policy and NPDES permit and ~~will~~ ~~meet~~ ~~meets~~ the requirements of the RCRA waste water treatment unit exclusion. Activities conducted under RA #9 have been incorporated into the Operable Unit 3 Final Record of Decision (ROD)

Schedule for entering into contracts: No contract is required.

Schedule for initiating construction: No construction is required for this project.

Schedule for conducting systems testing: Tank set-up and testing of WWTS is complete. October 31, 1994 (COMPLETED)

Schedule for commencing operations: Operations is the date the FEMP will begin treatment utilizing this Preferred Option. February 29, 1996† (COMPLETED)

Schedule for processing backlogged and currently generated mixed wastes: February 29, 1996 through September 30, 1996 (COMPLETED)

3.1.4 Waste Streams for which Technology Exists - Preferred Option:
Wastewater Treatment, Phase I (cont.)

Project Completion Date: September 30, 1996† (COMPLETED)

3.1.4.1 Waste Streams for which Technology Exists - Preferred
Option: Wastewater Treatment, Phase II

Section 3.1.4.1 provides updated schedules for treating FEMP mixed waste streams for which the preferred option is Wastewater Treatment. As part of Phase II of this preferred option, these waste streams will be treated on-site using the FEMP's Advanced Waste Water Treatment System (AWWT).

Waste waters are introduced into the AWWT-Slurry Dewatering Facility for precipitation and filtration of metal constituents. Filtrate from this process is directed to AWWT Phase 2 which consists of an activated carbon adsorption unit operation. Organic constituents are removed with the filter cake from the precipitation/filtration process or treated through AWWT Phase 2 if they remain in the filtrate.

Schedule for Initiating Treatment of Mixed Wastes Identified in the 1998 STP Annual Update: November 1, 1999† (COMPLETED)

Project Completion Date: March 1, 2000†

† Denotes milestone dates

3.1.5 Waste Streams for which Technology Exists - Preferred Option: Ohio Mobile Stabilization System

Project Name: Stabilization Project

The FEMP mixed waste streams for which the Preferred Option is identified as Ohio Mobile Stabilization System are listed in Table 5 of the Background Volume. Treatment of these waste streams will occur on-site using a vendor provided mobile service. Detailed information on this treatment is located in Section 3.1.5 of the Background Volume.

The FEMP published a request for information in the *Commerce Business Daily*. Multiple responses were received from companies capable of performing Mobile Stabilization.

The FEMP will implement implemented the Stabilization Project as part of CERCLA Removal Action #9 (RA #9.); however, treatment operations will not begin prior to Ohio EPA approval. Treatment operations began after obtaining Ohio EPA approval. Activities conducted under Removal Action #9 have been incorporated into the Operable Unit 3 Final Record of Decision (ROD).

MIXED WASTE STREAMS FOR WHICH TECHNOLOGY EXISTS

Project Start Date: October 31, 1994 (COMPLETED)

Schedule for submitting all applicable permit applications:

Not applicable. This project will be was initiated as part of RA #9. Activities conducted under Removal Action #9 have been incorporated into the Operable Unit 3 Final Record of Decision (ROD). The Project Specific Plan for this project was submitted in September 30, 1995. (COMPLETED)

Schedule for entering into contracts: May 31, 1995 (COMPLETED)

Schedule for initiating construction: Vendor will supply a fully constructed mobile system. October 31, 1995† (COMPLETED)

Schedule for conducting systems testing: November 30, 1995† Complete Operational Readiness Review. (COMPLETED)

Schedule for commencing operations: Operations is the date the FEMP will begin treatment utilizing this Preferred Option. November 30, 1995† (COMPLETED)

Schedule for processing backlogged mixed wastes: November 30, 1995 through September 30, 1996 (COMPLETED)

**3.1.5 Waste Streams for which Technology Exists - Preferred Option:
Ohio Mobile Stabilization System (cont.)**

Project Completion Date: September 30, 1996† (COMPLETED)

† Denotes milestone dates

**3.1.6 Waste Streams for which Technology Exists - Preferred Option:
Ohio Mobile Chemical Treatment System**

Project Name: Chemical Treatment Project

The FEMP mixed waste streams where the Preferred Option is identified as Ohio Mobile Chemical Treatment System are listed in Table 6 of the Background Volume. Treatment of these waste streams will occur on-site using vendor provided services, except for some debris (as defined in RCRA) macroencapsulation, which will occur off-site at a commercial facility. Detailed information on this treatment is located in Section 3.1.6 of the Background Volume.

~~Treatment of the Thorium Legacy Wastes will occur under the Stabilization Subproject of the Chemical Treatment Preferred Option. The thorium mixed waste inventory will be relocated to an approved location while evaluating stabilization options, which include onsite treatment or securing a contract with an offsite commercial treatment facility. Currently, 417 containers of hazardous thorium waste are scheduled to be treated and shipped to the Nevada Test Site. Characterization efforts may cause the number to increase in the future.~~

Multiple contracts will be entered into for the performance of treatment for each technology in the Chemical Treatment Project. Specific work plans will be developed for each on-site treatment technology. The technology specific work plans will be submitted to the State for approval. Construction of the facilities will be initiated upon State approval of the technology specific work plans.

MIXED WASTE STREAMS FOR WHICH TECHNOLOGY EXISTS

Project Start Date: October 31, 1994 (COMPLETED)

Schedule for submitting all applicable permit applications:

Not applicable. It is anticipated that this project will be initiated as part of CERCLA Removal Action #9. This project was initiated as part of CERCLA Removal Action #9. Activities conducted under this removal action have been incorporated into the Operable Unit 3 Final Record of Decision (ROD). The Draft Work Plan for this project will be submitted in November 30, 1995.† (COMPLETED)

3.1.6 Waste Streams for which Technology Exists - Preferred Option:
Ohio Mobile Chemical Treatment System (cont.)

A schedule for commencing operations will be provided in each technology project specific work plan submitted for approval.

Schedule for entering into contracts: The contract for implementation of the first technology will be entered into in April 30, 1996.†
(COMPLETED)

Additional contracts entered into under this Preferred Option will trigger the establishment of the following target dates/milestones:

The project specific work plan for each technology will be submitted for approval within 120 days of entering into the contract.†

~~The contract for the last technology will be entered into in September 30, 2000.~~

Schedule for initiating construction: Vendor will supply a fully constructed mobile system. Construction for each technology will be initiated within 30 days of approval of the project specific work plan.†

Schedule for conducting systems testing:
Operational Readiness and systems testing will be completed 120 days after completion of treatment facility construction.†

Schedule for commencing operations:
Treatment will be initiated within 14 days of completion of system testing for each technology.†

Schedule for processing backlogged and currently generated mixed wastes: February 28, 1997 through September 30, 2001

A schedule for processing backlogged and currently generated mixed waste will be provided by technology in each project specific work plan submitted for approval.

Project Completion Date: September 30, 2001 † **The last project conducted as part of Ohio Mobile Chemical Treatment System was completed on August 19, 1998.**

† Denotes milestone dates

3.1.7 Waste Streams for which Technology Exists - Preferred Option: TSCA Incinerator, Phase I

Project Name: Liquid Mixed Waste Project

The FEMP mixed waste streams (liquid portion only) for which the Preferred Option is identified as the TSCA Incinerator are listed in Table 7 of the Background Volume. Treatment of these waste streams will occur off-site at the DOE K-25 site in Oak Ridge, Tennessee.

The FEMP is currently allotted 693,000 pounds or approximately 318,780 kilograms of mixed low level waste treatment capacity per year at the TSCA Incinerator. The FEMP plans to bulk mixed waste for shipment to the TSCA Incinerator. Detailed information on this treatment is located in Section 3.1.7 of the Background Volume.

Bulking and transport of these wastes ~~will be~~ was implemented as part of CERCLA Removal Action #9 (RA #9). ~~However, these activities will not begin prior to Ohio EPA approval. These activities began after obtaining Ohio EPA approval. Activities conducted under this removal action have been incorporated into the Operable Unit 3 Final Record of Decision (ROD).~~

The milestone dates for TSCA Incinerator are shipping dates. The shipping dates are dependent on acceptance of the waste by the Oak Ridge Reservation TSCA Incinerator and the State of Tennessee.

The Liquid Mixed Waste Project is designed to address treatment and disposal of all liquid mixed waste currently in storage through the WWTS or the TSCA Incinerator Preferred Options.

MIXED WASTE STREAMS FOR WHICH TECHNOLOGY EXISTS

Project Start Date: October 1994 (COMPLETED)

Schedule for submitting all applicable permit applications: Not applicable. This project ~~will be~~ was initiated as part of RA #9. (COMPLETED)

Schedule for entering into contracts: Contracting complete (DOE facility to DOE facility agreement). (COMPLETED)

Schedule for initiating construction: No construction is required for this project.

3.1.7 Waste Streams for which Technology Exists - Preferred Option:
TSCA Incinerator (cont.)

Schedule for conducting systems testing: Tank set-up and testing were completed in October 1994. October 31, 1994 (COMPLETED)

Schedule for commencing operations: Operations began with the bulking of waste streams. June 30, 1995 (COMPLETED)

Schedule for processing backlogged and currently generated mixed wastes: June 30, 1995 through September 30, 1996 (COMPLETED)

Project Completion Date: Shipments from the FEMP to the TSCA Incinerator will be complete by September 30, 1996† (COMPLETED)

3.1.7.1 Waste Streams for which Technology Exists - Preferred Option: TSCA Incinerator, Phase II

Phase II of the TSCA Incinerator Preferred Option provides updated schedules for the shipment of individual batches of liquid mixed waste to the TSCA Incinerator. These schedules are based on the TSCA Incinerator FY 2000 Burn Plan. Since capacity is allocated on a fiscal year basis, schedules for shipping additional batches of liquid mixed waste will be established in future amendments to the STP.

Schedule for Completing Shipment: Shipment of Batches 9, 10 and 11 to the TSCA Incinerator will be completed by September 30, 2000†

Schedule for Providing Additional Milestones for Shipment: Schedules for shipping additional batches of mixed waste to the TSCA Incinerator will be provided by December 31, 2000†

† Denotes milestone dates

3.1.8 Waste Streams for which Technology Exists - Organic Treatment Project

The Organic Treatment Project involves the off-site shipment of mixed wastes containing organic constituents and debris for treatment to Materials and Energy Corporation in Oak Ridge, Tennessee. Treatment will be conducted under the DOE complex-wide Broad Spectrum contract.

Schedule for Entering into Contract: March 31, 1999 †
(COMPLETED)

Schedule for Initiating Preparation of Wastes for Transport: September 15, 1999 † (COMPLETED)

Schedule for Completing Shipment for Off-Site Treatment of Mixed Wastes Identified in the 1998 STP Annual Update: September 30, 2001 †

3.1.9 Waste Streams for which Technology Exists - Inorganic Treatment Project

The Inorganic Treatment Project involves the shipment of mixed waste off-site to a commercial facility for treatment of inorganic constituents.

Schedule for Entering into Contract: March 31, 2001 †

Schedule for Initiating Preparation of Wastes for Transport: October 1, 2001 †

Schedule for Completing Shipment for Off-Site Treatment of Mixed Wastes Identified in the 1998 Annual STP Update: September 30, 2002 †

3.2 Mixed Waste Streams for which Technology Exists But Needs Adaption or for which No Technology Exists

The FEMP has not identified any mixed waste streams for which significant adaptation and technology development is required for treatment. After final characterization, which will occur as a part of the project management process, certain variances may be requested. Specifically, there may be some constituents for which the LDR treatment standard is incineration. The FEMP may request a variance to allow chemical destruction or stabilization. Also, certain debris may require a technology which is not practical; therefore a variance may be requested for these wastes.

3.3 Mixed Waste Streams Requiring Further Characterization or for which Technology Assessment Has Not Been Done

All FEMP mixed low level waste streams identified in the STP have a Preferred Option for treatment.

3.3.1 Uranium Waste Disposition (UWD) Materials

The FEMP has identified mixed waste included in a population of uranium materials declared waste in December 1998. A full technology assessment has not yet been completed. The FEMP will submit a proposed amendment to the STP specifying the associated target dates or milestones for the treatment of these wastes with the issuance of the STP Annual Update by December 31, 1999.

3.3.2 Thorium Legacy Mixed Waste

The FEMP has identified mixed waste included in a population of thorium legacy waste. A full technology assessment has not yet been completed. The FEMP will submit a proposed amendment to the STP specifying the associated target dates or milestones for the treatment of these wastes by January 31, 2000.

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